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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICHELLE SALINAS and RAYMEL
WASHINGTON, individually and on behalf of
all others similarly situated.

Plaintiffs.

V.

BLOCK, INC. and CASH
APP INVESTING, LLC,

Defendants.

Case No. 3:22-cv-04823

**STIPULATION PURSUANT TO CIVIL
L.R. 6-1(B) AND [PROPOSED] ORDER
TO MODIFY CASE SCHEDULE**

Magistrate Judge: Hon. Donna M. Ryu

1 Pursuant to Local Rule 6-1(b), Plaintiffs Michelle Salinas and Raymel Washington and
 2 Defendants Block, Inc. and Cash App Investing, LLC, by and through the undersigned counsel,
 3 hereby stipulate and agree to the following proposed modification of the case schedule:

4 WHEREAS, the Complaint (ECF No. 1) was filed on August 23, 2022;

5 WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash*
 6 *App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

7 WHEREAS, the parties previously stipulated, and the Court approved, that the time for
 8 Defendants to answer or otherwise respond to the Complaint be extended to February 3, 2023 (ECF
 9 Nos. 22, 25, 33, 34, 39, 40);

10 WHEREAS, on December 6, 2022, the Court ordered that this matter and *Gordon* be
 11 related;

12 WHEREAS, on December 15, 2022, Defendants filed a motion to consolidate the *Salinas*
 13 and *Gordon* actions that is opposed by Plaintiff Gordon;

14 WHEREAS, the parties previously stipulated to continue the hearing on Defendants'
 15 motion to consolidate to the second Thursday after the parties engaged in mediation (ECF No. 50);

16 WHEREAS, the parties previously stipulated that if the Court grants Defendants' motion to
 17 consolidate, then the deadline for Defendants to answer or otherwise respond be continued to 30
 18 days after the filing of a consolidated complaint (ECF No. 50);

19 WHEREAS, the parties previously stipulated that if the Court denies Defendant's motion
 20 to consolidate, then the deadline for Defendants to answer or otherwise respond to the Complaint
 21 be continued to 30 days after the Court's denial of the motion (ECF No. 50);

22 WHEREAS, the Court vacated the hearing on Defendants' motion to consolidate and set a
 23 case management conference for May 11, 2023 at 1:30 p.m. by a Zoom videoconference with
 24 updated case management conference statements due by May 4, 2023 (ECF No. 51);

25 WHEREAS, the parties engaged in mediation in an attempt to reach an early resolution of
 26 this action on April 24, 2023;

27 WHEREAS, the parties plan to continue discussions regarding the possibility of an early
 28 resolution of this action and believe the case should be stayed while the parties engage in those

discussions;

Plaintiffs and Defendants hereby stipulate that:

- The case management conference currently scheduled for May 11, 2023 be continued to July 13, 2023 at 1:30 p.m. by Zoom videoconference with updated case management conference statements due by July 6, 2023;
 - The action is otherwise stayed through the completion of the case management conference.

This is the fifth extension sought by the parties to this litigation and is sought because the parties are attempting to resolve this dispute.

IT IS SO STIPULATED.

Dated: May 1, 2023

By: _____ /s/ *Michelle Visser*

Michelle Visser
ORRICK, HERRINGTON & SUTCLIFFE LLP
Attorneys for Defendants
Block Inc. and Cash App Investing LLC

By: _____ /s/ *David Goodwin*

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GUSTAFSON GLUEK PLLC

By: /s/ Scott D. Hirsch
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SCOTT HIRSCH LAW GROUP, PLLC

By: /s/ Gary S. Graifman
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By: /s/ Nicholas Migliaccio
Nicholas Migliaccio
MIGLIACCIO & RATHOD LLP

Attorneys for Plaintiffs

1 IT IS SO ORDERED.
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Dated: May 1, 2023

By:

Jacqueline Scott Corley
Hon. Jacqueline Scott Corley
U.S. DISTRICT JUDGE